

EXHIBIT F

1
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK
4 Case No. 11 Civ. 0691 (LAK)

-----x
5 CHEVRON CORPORATION,
6 Plaintiff,
7 - against -
8 STEVEN DONZIGER, et al.,
9 Defendants.

-----x

10 June 6, 2019
11 9:45 a.m.

12 200 Park Avenue
13 New York, New York

14
15 EXAMINATION BEFORE TRIAL of LAURA MILLER,
16 held at the offices of GIBSON DUNN & CRUTCHER LLP,
17 located at 200 Park Avenue, New York, New York
18 10166, before Anthony Giarro, a Registered
19 Professional Reporter, a Certified Realtime
20 Reporter and a Notary Public of the State of New
21 York.

<p style="text-align: right;">Page 78</p> <p>1 LAURA MILLER</p> <p>2 Q Ms. Miller, there are</p> <p>3 deposits into your accounts from a</p> <p>4 Fidelity Brokerage Services account.</p> <p>5 Are you familiar with that</p> <p>6 account?</p> <p>7 A Yes, I am.</p> <p>8 Q Whose account is the</p> <p>9 Fidelity Brokerage?</p> <p>10 A My deceased father.</p> <p>11 Q Is that account, the</p> <p>12 Fidelity Brokerage Services account, an</p> <p>13 account to which Mr. Donziger has any</p> <p>14 access?</p> <p>15 A No.</p> <p>16 Q And is it an account into</p> <p>17 which you or he have ever transferred any</p> <p>18 money?</p> <p>19 A No.</p> <p>20 Q So it's just an account from</p> <p>21 which you receive money?</p> <p>22 A Yes.</p> <p>23 Q And the source of all the</p> <p>24 money in that account is your parents; is</p> <p>25 that right?</p>	<p style="text-align: right;">Page 80</p> <p>1 LAURA MILLER</p> <p>2 MS. NEUMAN: No.</p> <p>3 Q Ms. Miller, did you have any</p> <p>4 conversations related to your depo during</p> <p>5 the break?</p> <p>6 A We just discussed that I</p> <p>7 need to take it slow.</p> <p>8 Q With Mr. Donziger?</p> <p>9 A Yes.</p> <p>10 Q I'll ask you some questions</p> <p>11 about electronics.</p> <p>12 So in your household</p> <p>13 currently, how many computers are there?</p> <p>14 A Three.</p> <p>15 Q And who do they belong to?</p> <p>16 A Steven has one, I have one,</p> <p>17 and our son has one.</p> <p>18 Q Does Mr. Donziger have any</p> <p>19 access to your computer?</p> <p>20 A No.</p> <p>21 Q Does he have any access to</p> <p>22 your son's computer?</p> <p>23 A No.</p> <p>24 Q You've never seen him use</p> <p>25 your computer or your son's computer?</p>
<p style="text-align: right;">Page 79</p> <p>1 LAURA MILLER</p> <p>2 A Yes.</p> <p>3 MS. NEUMAN: Go off the</p> <p>4 record for about five minutes.</p> <p>5 THE VIDEOGRAPHER: The time</p> <p>6 on the video monitor is 11:19 a.m.</p> <p>7 We're off the record. This ends</p> <p>8 Media 1.</p> <p>9 (A short recess was taken.)</p> <p>10 THE VIDEOGRAPHER: We are</p> <p>11 back on the record. The time on the</p> <p>12 video monitor is 11:37 a.m. This</p> <p>13 starts Media 2.</p> <p>14 MS. NEUMAN: Mr. Donziger, I</p> <p>15 neglected to note at the beginning of</p> <p>16 the deposition, we've noted in prior</p> <p>17 discussions that you've taken</p> <p>18 pictures of people without their</p> <p>19 consent.</p> <p>20 So we ask you not to do</p> <p>21 that. If you need to take a picture</p> <p>22 of someone, you need to ask their</p> <p>23 consent.</p> <p>24 MR. DONZIGER: Can I take a</p> <p>25 picture of you?</p>	<p style="text-align: right;">Page 81</p> <p>1 LAURA MILLER</p> <p>2 A No.</p> <p>3 Q The computer that you have,</p> <p>4 was that a computer that you purchased?</p> <p>5 A Yes.</p> <p>6 Q And the computer that your</p> <p>7 son has, who purchased that?</p> <p>8 A I don't recall.</p> <p>9 Q The computer that</p> <p>10 Mr. Donziger has, do you know what kind</p> <p>11 of computer it is?</p> <p>12 A I think it's an Apple. I'm</p> <p>13 not sure what kind.</p> <p>14 Q Do you ever use that</p> <p>15 computer?</p> <p>16 A No.</p> <p>17 Q Never?</p> <p>18 A No.</p> <p>19 Q In terms of iPads, do you</p> <p>20 have any iPads in your apartment?</p> <p>21 A We used to. But we don't</p> <p>22 any longer.</p> <p>23 Q How many did you used to</p> <p>24 have?</p> <p>25 A One.</p>

<p style="text-align: right;">Page 82</p> <p>1 LAURA MILLER</p> <p>2 Q And whose was it?</p> <p>3 A Mine.</p> <p>4 Q And was that one that was</p> <p>5 bought on your account or a different</p> <p>6 account or do you recall?</p> <p>7 A It was given through the</p> <p>8 company I had worked for at the time.</p> <p>9 Q Your company gave you an</p> <p>10 iPad?</p> <p>11 A Yes.</p> <p>12 Q Did you give it back when</p> <p>13 you stopped working there?</p> <p>14 A Yes.</p> <p>15 Q And was that iPad used</p> <p>16 exclusively by yourself?</p> <p>17 A Yes.</p> <p>18 Q So Mr. Donziger never had</p> <p>19 access to it?</p> <p>20 A No.</p> <p>21 Q And currently, there's no</p> <p>22 iPads in your household?</p> <p>23 A I don't recall.</p> <p>24 Q You don't currently use one?</p> <p>25 A No. My son doesn't. I</p>	<p style="text-align: right;">Page 84</p> <p>1 LAURA MILLER</p> <p>2 A No.</p> <p>3 Q Do you have a phone number</p> <p>4 that you use for Mr. Donziger?</p> <p>5 A I use his public phone</p> <p>6 number.</p> <p>7 Q Do you know what it is?</p> <p>8 A Yes.</p> <p>9 Q Can you state it for the</p> <p>10 record, please?</p> <p>11 A [REDACTED]-2526.</p> <p>12 Q Do you have any other phone</p> <p>13 numbers on which you can reach</p> <p>14 Mr. Donziger?</p> <p>15 A No.</p> <p>16 Q Do you ever use any</p> <p>17 messaging apps to communicate with</p> <p>18 Mr. Donziger?</p> <p>19 A Yes.</p> <p>20 Q Which ones?</p> <p>21 A WhatsApp.</p> <p>22 Q Any others?</p> <p>23 A No.</p> <p>24 Q Are you aware of</p> <p>25 Mr. Donziger having an iCloud account?</p>
<p style="text-align: right;">Page 83</p> <p>1 LAURA MILLER</p> <p>2 don't think we use them, no.</p> <p>3 Q How many phones are in your</p> <p>4 household?</p> <p>5 A Three.</p> <p>6 Q And is that one for</p> <p>7 Mr. Donziger, one for yourself and one</p> <p>8 for your son?</p> <p>9 A Yes.</p> <p>10 Q And were those -- your</p> <p>11 phone, is that a phone you bought?</p> <p>12 A Yes.</p> <p>13 Q How did you get your phone?</p> <p>14 A I purchased it.</p> <p>15 Q Your son's phone?</p> <p>16 A I purchased it.</p> <p>17 Q You purchased that?</p> <p>18 A Yes.</p> <p>19 Q Have you ever purchased any</p> <p>20 phones for Mr. Donziger?</p> <p>21 A No.</p> <p>22 Q Do you know of Mr. Donziger</p> <p>23 ever having multiple phones?</p> <p>24 A At the same time?</p> <p>25 Q Correct.</p>	<p style="text-align: right;">Page 85</p> <p>1 LAURA MILLER</p> <p>2 A No. I'm not aware.</p> <p>3 Q Are you aware of him having</p> <p>4 any cloud-based accounts?</p> <p>5 A I'm not aware.</p> <p>6 Q Web sites, are you aware of</p> <p>7 Mr. Donziger maintaining any Web sites?</p> <p>8 A Yes.</p> <p>9 Q Can you tell me what those</p> <p>10 Web sites are?</p> <p>11 A Just for his law firm.</p> <p>12 Q And do you know the address</p> <p>13 of the Web sites that you're aware of?</p> <p>14 A I think it's Steven Donziger</p> <p>15 & Associates.</p> <p>16 Q .com?</p> <p>17 A Yes.</p> <p>18 Q Do you ever do any work on</p> <p>19 Mr. Donziger's Web sites?</p> <p>20 A I introduced him to a</p> <p>21 gentleman who helps build Web sites.</p> <p>22 That's all.</p> <p>23 Q But you yourself never</p> <p>24 worked on the Web sites?</p> <p>25 A I think I did it once. I</p>

<p style="text-align: right;">Page 90</p> <p>1 LAURA MILLER</p> <p>2 phone bill out of your accounts?</p> <p>3 A Right now, the past few</p> <p>4 months, I have been because his accounts</p> <p>5 are frozen, yes.</p> <p>6 Q To your knowledge, has he</p> <p>7 attempted to open a new account since the</p> <p>8 TD accounts were frozen?</p> <p>9 A Not to my knowledge.</p> <p>10 Q I'm going to hand you some</p> <p>11 documents being marked as Exhibit 5659.</p> <p>12 They were produced by AT&T. And they</p> <p>13 start with the Bates number 8762 and go</p> <p>14 through 8767.</p> <p>15 (The above-referred-to</p> <p>16 document was marked as Exhibit 5659</p> <p>17 for identification, as of this date.)</p> <p>18 Q So these are AT&T documents</p> <p>19 that they sent to us --</p> <p>20 A Right. Okay.</p> <p>21 Q -- under subpoena.</p> <p>22 So if you go down to user</p> <p>23 information on the first page, page 8762,</p> <p>24 it shows a phone number of [REDACTED]-2526.</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 92</p> <p>1 LAURA MILLER</p> <p>2 A No. I bought him the phone.</p> <p>3 Q So if we go to the next</p> <p>4 page, 8764, there's the number</p> <p>5 [REDACTED]-7967 that was used for a couple</p> <p>6 of years, year and a half. Are you</p> <p>7 familiar with that number?</p> <p>8 A I have no knowledge.</p> <p>9 Q You don't know anything</p> <p>10 about that number?</p> <p>11 A No.</p> <p>12 Q Correct?</p> <p>13 A Correct.</p> <p>14 Q Go to the next page, 8765.</p> <p>15 There's a phone number associated with</p> <p>16 Mr. Donziger's account, [REDACTED]-2457,</p> <p>17 that was used for, more or less, four</p> <p>18 years, 2014, 2018. Do you see that?</p> <p>19 A Yes. I see it. I have no</p> <p>20 knowledge.</p> <p>21 Q You don't know what that</p> <p>22 number relates to?</p> <p>23 A Nope.</p> <p>24 Q The next page, 8766, the</p> <p>25 number associated with Mr. Donziger's</p>
<p style="text-align: right;">Page 91</p> <p>1 LAURA MILLER</p> <p>2 Q Are you familiar with that</p> <p>3 number?</p> <p>4 A Yes.</p> <p>5 Q That's the number you gave</p> <p>6 earlier?</p> <p>7 A Yes.</p> <p>8 Q So you know that number to</p> <p>9 be Mr. Donziger's number?</p> <p>10 A Mm-hmm.</p> <p>11 Q If you look on the next</p> <p>12 page, Bates 763, there's a number</p> <p>13 [REDACTED]-4656 associated with</p> <p>14 Mr. Donziger's since 2016?</p> <p>15 A Yes.</p> <p>16 Q Are you familiar with that</p> <p>17 number?</p> <p>18 A Yes.</p> <p>19 Q What's that number for?</p> <p>20 A Our son.</p> <p>21 Q So that number's actually</p> <p>22 under his name?</p> <p>23 A It goes under his bill, yes.</p> <p>24 Q Sorry. I thought you said</p> <p>25 it was on yours earlier.</p>	<p style="text-align: right;">Page 93</p> <p>1 LAURA MILLER</p> <p>2 account, [REDACTED]-1715, do you know</p> <p>3 anything about that number?</p> <p>4 A I have no knowledge, no.</p> <p>5 Q One more.</p> <p>6 A Okay.</p> <p>7 Q Page 8767, it's a phone</p> <p>8 number, [REDACTED]-1731, used from 2012 to</p> <p>9 2016 on Mr. Donziger's account. Do you</p> <p>10 know anything about that one?</p> <p>11 A I have no knowledge. But I</p> <p>12 am wondering if one of these might be an</p> <p>13 iPad.</p> <p>14 Q An iPad with a cell</p> <p>15 information?</p> <p>16 A Yeah. But I can't recall.</p> <p>17 Q You don't recall whether</p> <p>18 Mr. Donziger had an iPad and if so,</p> <p>19 whether it had a cell phone number</p> <p>20 attached to it?</p> <p>21 A I can't recall, no.</p> <p>22 Q Does anybody have an Apple</p> <p>23 Watch?</p> <p>24 A No.</p> <p>25 Q Other than WhatsApp, do you</p>

24 (Pages 90 - 93)

<p style="text-align: right;">Page 102</p> <p>1 LAURA MILLER</p> <p>2 me.</p> <p>3 A Mm-hmm.</p> <p>4 Q Were you on the</p> <p>5 Denver-Colorado trip?</p> <p>6 A No.</p> <p>7 Q The Washington, D.C. trip?</p> <p>8 A No.</p> <p>9 Q The May 2016 Amelia Island?</p> <p>10 A Yes.</p> <p>11 Q Was anyone other than</p> <p>12 yourself and Mr. Donziger on that trip or</p> <p>13 your son?</p> <p>14 A Our son. That's it.</p> <p>15 Q No one else?</p> <p>16 A No.</p> <p>17 Q Did that trip have any</p> <p>18 business purpose that you're aware of?</p> <p>19 A No.</p> <p>20 Q The Washington, D.C. trip in</p> <p>21 June, were you involved in that?</p> <p>22 A In June, no.</p> <p>23 Q On page 3, the August trip</p> <p>24 to Portugal, were you involved in that?</p> <p>25 MR. DONZIGER: I'm going to</p>	<p style="text-align: right;">Page 104</p> <p>1 LAURA MILLER</p> <p>2 way to business?</p> <p>3 A No.</p> <p>4 Q That you're aware of?</p> <p>5 A It did not relate to any</p> <p>6 business.</p> <p>7 Q Was there any non-family</p> <p>8 members with you on that trip?</p> <p>9 MR. DONZIGER: Objection.</p> <p>10 This is marital privilege.</p> <p>11 A Okay.</p> <p>12 Q What was your answer?</p> <p>13 A It's marital privilege. I</p> <p>14 agree. This is -- it was a family</p> <p>15 vacation.</p> <p>16 MR. DONZIGER: Listen, it's</p> <p>17 a marital privilege. I'm asserting</p> <p>18 marital privilege.</p> <p>19 A Okay. I'm asserting marital</p> <p>20 privilege for me.</p> <p>21 MR. DONZIGER: Do not</p> <p>22 answers the questions as long as I'm</p> <p>23 asserting marital privilege.</p> <p>24 MS. NEUMAN: Mr. Donziger,</p> <p>25 you can't properly instruct the</p>
<p style="text-align: right;">Page 103</p> <p>1 LAURA MILLER</p> <p>2 object. I'm going to assert marital</p> <p>3 privilege over the rest of this,</p> <p>4 unless you can actually figure out</p> <p>5 some nexus between a trip and my</p> <p>6 assets or money. She's already</p> <p>7 testified she was not involved in</p> <p>8 investor activity as a general</p> <p>9 matter. And I just think this is</p> <p>10 redundant and harassing.</p> <p>11 So I'm asserting marital</p> <p>12 privilege. If you feel like out of</p> <p>13 all these things remaining you can</p> <p>14 find something that really hones in</p> <p>15 on what you're properly entitled to</p> <p>16 question her about, please do so.</p> <p>17 But if you're going to go</p> <p>18 through this generally, I'm going to</p> <p>19 assert marital privilege and ask the</p> <p>20 witness to please respect my marital</p> <p>21 privilege and not answer.</p> <p>22 Q The August trip to Portugal,</p> <p>23 were you involved in that trip?</p> <p>24 A Yes.</p> <p>25 Q Did that trip relate in any</p>	<p style="text-align: right;">Page 105</p> <p>1 LAURA MILLER</p> <p>2 witness not to answer. I'll state</p> <p>3 that for the record.</p> <p>4 MR. DONZIGER: Okay. But</p> <p>5 I'm asking her to respect my marital</p> <p>6 privilege.</p> <p>7 A I respect it. Okay.</p> <p>8 Q On any of the trips that</p> <p>9 you've taken abroad with Mr. Donziger</p> <p>10 since 2014, has he taken any devices and</p> <p>11 left them in any foreign location?</p> <p>12 MR. DONZIGER: That's fine.</p> <p>13 You can ask that question. But I</p> <p>14 object to the phrasing of the</p> <p>15 question. If you know, lay a</p> <p>16 foundation, if you know, has he taken</p> <p>17 devices.</p> <p>18 MS. NEUMAN: You have to put</p> <p>19 if you know in front of a witness.</p> <p>20 It's obviously based on their</p> <p>21 personal knowledge. You can ask</p> <p>22 other questions if you think some of</p> <p>23 my questions need clarifying.</p> <p>24 Can you read the question</p> <p>25 back to the witness, please?</p>

<p style="text-align: right;">Page 106</p> <p>1 LAURA MILLER</p> <p>2 (The requested portion was</p> <p>3 read back by the court reporter.)</p> <p>4 A He lost his phone last --</p> <p>5 last August.</p> <p>6 Q In what location?</p> <p>7 A In France.</p> <p>8 Q In any trip that you've been</p> <p>9 on with Mr. Donziger since 2014, has he</p> <p>10 taken any money or other assets with him</p> <p>11 and deposited it in a foreign location or</p> <p>12 left it?</p> <p>13 A Not to my knowledge.</p> <p>14 Q Other than the trip to</p> <p>15 Portugal, were you involved in any of the</p> <p>16 other trips shown on page 3?</p> <p>17 A No.</p> <p>18 Q Looking at page 4 of Exhibit</p> <p>19 5660, can you take a minute to read each</p> <p>20 of those dates and locations and let me</p> <p>21 know if you were involved in any of those</p> <p>22 trips?</p> <p>23 MR. DONZIGER: I'm going to</p> <p>24 object. I mean first of all, the</p> <p>25 time frame of these trips, 2016, was</p>	<p style="text-align: right;">Page 108</p> <p>1 LAURA MILLER</p> <p>2 A No.</p> <p>3 Q The trips on page 6, did you</p> <p>4 have any involvement in any of those</p> <p>5 trips?</p> <p>6 A May 28th to 30th in</p> <p>7 Jacksonville, Florida.</p> <p>8 Q Did that trip have any</p> <p>9 business purpose that you're aware of?</p> <p>10 A No business purpose.</p> <p>11 Q As to the trips that you</p> <p>12 weren't involved in, do you have any</p> <p>13 knowledge about the purposes of those</p> <p>14 trips?</p> <p>15 A No.</p> <p>16 Q On page 7, there's six trips</p> <p>17 shown.</p> <p>18 Were you involved in any of</p> <p>19 the trips?</p> <p>20 A Yes, I was. The June 27th</p> <p>21 to July 5th trip, the July 8th to 10th</p> <p>22 trip and the July 27th to August 3rd</p> <p>23 trip.</p> <p>24 Q Did any of those trips have</p> <p>25 any business purpose that you're aware</p>
<p style="text-align: right;">Page 107</p> <p>1 LAURA MILLER</p> <p>2 prior to the entrance of the</p> <p>3 judgment.</p> <p>4 MS. NEUMAN: Again, he's</p> <p>5 already ruled on the relevant time</p> <p>6 frame which is not the date of the</p> <p>7 money judgment.</p> <p>8 Q I see you're jumping ahead.</p> <p>9 A No. It's pretty obvious.</p> <p>10 It's a school vacation in December.</p> <p>11 Q Were you involved in any of</p> <p>12 the other trips?</p> <p>13 A No.</p> <p>14 Q On page 5, can you read the</p> <p>15 dates and locations and let me know if</p> <p>16 you participated in any of those trips?</p> <p>17 A February 17th to the 21st, I</p> <p>18 was with Steven and my son.</p> <p>19 Q In Ecuador?</p> <p>20 A No. In Savannah, Georgia.</p> <p>21 Q And did that trip have any</p> <p>22 business purpose, to your knowledge?</p> <p>23 A No.</p> <p>24 Q Were you involved in any of</p> <p>25 the other trips?</p>	<p style="text-align: right;">Page 109</p> <p>1 LAURA MILLER</p> <p>2 of?</p> <p>3 A No.</p> <p>4 MR. DONZIGER: I'm going to</p> <p>5 ask for a break.</p> <p>6 MS. NEUMAN: Okay. Go off</p> <p>7 the record.</p> <p>8 THE VIDEOGRAPHER: The time</p> <p>9 on the video monitor is 12:08 p.m.</p> <p>10 We're off the record.</p> <p>11 (A short recess was taken.)</p> <p>12 THE VIDEOGRAPHER: We are</p> <p>13 back on the record. The time on the</p> <p>14 video monitor is 12:12 p.m.</p> <p>15 Q Ms. Miller, did you have any</p> <p>16 conversations related to your depo during</p> <p>17 the break?</p> <p>18 A Yes. I'm reading too fast.</p> <p>19 And I made a mistake.</p> <p>20 Q And do you want to correct</p> <p>21 something?</p> <p>22 A Yes. In Deauville, Steven</p> <p>23 did have some meetings. I was not</p> <p>24 involved with them.</p> <p>25 Q You're referring to the trip</p>

<p style="text-align: right;">Page 178</p> <p>1 LAURA MILLER</p> <p>2 that separately. And Mr. Donziger</p> <p>3 wanted an opportunity to question the</p> <p>4 witness before 3:30. So I'm going to</p> <p>5 turn the witness over to Mr. Donziger</p> <p>6 for that purpose at this time.</p> <p>7 MR. DONZIGER: Thank you.</p> <p>8 Just to clarify further, do</p> <p>9 you have more questions other than</p> <p>10 the ones she declined to answer?</p> <p>11 MS. NEUMAN: No. My</p> <p>12 questions relate to the ones she</p> <p>13 declined to answer.</p> <p>14 MR. DONZIGER: Those aside,</p> <p>15 you have no more questions?</p> <p>16 MS. NEUMAN: No. I don't</p> <p>17 think so.</p> <p>18 EXAMINATION BY</p> <p>19 MR. DONZIGER:</p> <p>20 Q I'm just going to ask you a</p> <p>21 few questions -- okay?</p> <p>22 A Mm-hmm.</p> <p>23 Q -- related to some things</p> <p>24 you said in this deposition.</p> <p>25 Do you remember that you saw</p>	<p style="text-align: right;">Page 180</p> <p>1 LAURA MILLER</p> <p>2 MS. NEUMAN: Physically, you</p> <p>3 mean?</p> <p>4 MR. DONZIGER: Yes.</p> <p>5 MS. NEUMAN: Writes the</p> <p>6 checks?</p> <p>7 MR. DONZIGER: Writes the</p> <p>8 checks.</p> <p>9 A I do.</p> <p>10 Q Referencing your attention</p> <p>11 to my history of cell phones, my use of</p> <p>12 cell phones, as a general matter, do you</p> <p>13 have any recollection other than the one</p> <p>14 time you stated in your testimony to me,</p> <p>15 having lost cell phones?</p> <p>16 A Do I know that you lose</p> <p>17 them?</p> <p>18 Q Have you known me to be</p> <p>19 someone --</p> <p>20 A You lose everything, yeah.</p> <p>21 Q -- on occasion loses cell</p> <p>22 phones?</p> <p>23 A Yes. Many times.</p> <p>24 Q Would you say I'm kind of</p> <p>25 disorganized when it comes to that stuff?</p>
<p style="text-align: right;">Page 179</p> <p>1 LAURA MILLER</p> <p>2 a document that showed in a particular</p> <p>3 year, I think it was 2017, the Gibson,</p> <p>4 Dunn documents said that I had</p> <p>5 transferred to you was significantly</p> <p>6 higher than some of the other years? Do</p> <p>7 you remember that?</p> <p>8 A Yes.</p> <p>9 Q Can you explain why in that</p> <p>10 particular year, those funds might have</p> <p>11 been higher than some of the other years?</p> <p>12 MS. NEUMAN: Objection.</p> <p>13 Asked and answered. But you can</p> <p>14 answer.</p> <p>15 A I'll answer it. I did not</p> <p>16 really work that year. I did not have a</p> <p>17 separate income coming in. And you had</p> <p>18 to give more money to supplement and pay</p> <p>19 for more of our household expenses.</p> <p>20 Q And as a general matter, who</p> <p>21 pays most of the bills in your household?</p> <p>22 A It varies month to month.</p> <p>23 Q Who actually</p> <p>24 administratively pays the bills?</p> <p>25 A I do.</p>	<p style="text-align: right;">Page 181</p> <p>1 LAURA MILLER</p> <p>2 MS. NEUMAN: Objection.</p> <p>3 Leading.</p> <p>4 Q What's your opinion of my</p> <p>5 level of organization with that kind of</p> <p>6 stuff?</p> <p>7 A Horrible.</p> <p>8 MS. NEUMAN: That kind of</p> <p>9 stuff being phones?</p> <p>10 MR. DONZIGER: Phones.</p> <p>11 A Wallets, cell phones, keys.</p> <p>12 Q And do you remember when</p> <p>13 Ms. Neuman took you through that chart,</p> <p>14 purportedly documenting all my travel</p> <p>15 over several years?</p> <p>16 A Yes.</p> <p>17 Q So my question is, on the</p> <p>18 trips that you characterize as personal</p> <p>19 in nature --</p> <p>20 A Right.</p> <p>21 Q -- as a general matter,</p> <p>22 would I do work related to the Ecuador</p> <p>23 case that I characterize as personal in</p> <p>24 nature?</p> <p>25 MS. NEUMAN: Objection.</p>

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1
2 CERTIFICATION
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4

5 I, ANTHONY GIARRO, a Shorthand Reporter and a
6 Notary Public, do hereby certify that the foregoing
7 witness, LAURA MILLER, was duly sworn on the date
8 indicated, and that the foregoing, to the best of
9 my ability, is a true and accurate transcription of
10 my stenographic notes.

11 I further certify that I am not employed by
12 nor related to any party to this action.

13
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16 ANTHONY GIARRO
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1
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7 NAME OF CASE: Chevron RICO
8 DATE OF DEPOSITION: June 6, 2019
9 NAME OF DEPONENT: Laura Miller

10 PAGE LINE (S) CHANGE REASON

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21 LAURA MILLER

22 SUBSCRIBED AND SWORN TO BEFORE ME
23 THIS ____ DAY OF _____, 20__
24

25 (NOTARY PUBLIC) MY COMMISSION EXPIRES:

51 (Pages 198 - 199)